



October 23, 2019

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
P.O. Box 4313  
Baton Rouge, Louisiana 70821-4313

**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa  
Gulf South Pipeline Company, LP  
Koch Fee Well Compressor Station (Agency Interest # 105589)  
Permit No. 0400-00107-02**

To Whom It May Concern:

Gulf South Pipeline Company, LP (Gulf South) is submitting this annual report for its Koch Fee Well Compressor Station, located in Bossier Parish, as required by 40 CFR 60.5420a(b). The facility is located at 32.38706° North, -93.44039° West. To reach the site, take Highway 527 east from Koran for roughly 0.45 miles, then south on Fairview Point Road. Take Fairview Point Road 1.25 miles, then turn left onto CC Sandidge Road. Go 0.7 miles then turn right onto Pine Cove Road. Go 1.5 miles then turn left onto Johnson Drive. Go 0.15 miles then turn right onto Spring Branch Road. Facility is then 0.1 miles ahead on left.

This report covers the period from August 3, 2018 through August 2, 2019. Pursuant to 60.5420a(b), the report is due by October 31 and is therefore timely.

Quarterly leak detection and repair (LDAR) surveys were conducted at this facility in accordance with 40 CFR 60.5397a(g)(2). Details regarding each survey are reflected in Table 1. **No leaks were found during any of the four quarterly surveys covered by this annual report.**

The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Table 1 provides many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

**Gulf South Pipeline Company, LP**

9 Greenway Plaza, Ste. 2800 Houston, TX 77046 Tel. 713.479.8000 [www.gulfsouthpl.com](http://www.gulfsouthpl.com)



Gulf South is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, there have been no deviations from the requirements of 40 CFR 60, Subpart OOOOa at this facility during the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "David Nickel".

David Nickel  
Environmental Specialist

Attachments

cc: Bistineau Compressor Station (Koch Fee Well Air Files)  
US EPA, Region VI (Submitted electronically to [R6WellCompletion@epa.gov](mailto:R6WellCompletion@epa.gov))

**Table 1**  
**Summary of LDAR Monitoring Surveys**

Company Name: Gulf South Pipeline Company, LP

Facility Name: Koch Fee Well Station

Reporting Period: August 3, 2018 through August 2, 2019

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
8/23/2018	8:00 AM	8:30 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	71	Sunny	0	FLIR Model 320 Optical Gas Imaging Camera	No
10/31/2018	3:05 PM	3:25 PM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	81	Partly Cloudy	3	FLIR Model 320 Optical Gas Imaging Camera	No
2/13/2019	1:00 PM	1:20 PM	Bud McCorkle	Trained thermographer with 13 years of experience operating OGI camera	68	Sunny	3	FLIR Model 320 Optical Gas Imaging Camera	No
6/5/2019	2:30 PM	2:50 PM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	75	Mostly Cloudy	2	FLIR Model 320 Optical Gas Imaging Camera	No

## 40 CFR 60, Subpart OOOOa Annual Report Certification Statement

*I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.*

  
A handwritten signature in blue ink, appearing to read "Dave Perkins", is written over a horizontal line.

Dave Perkins

Vice President – Environmental, Safety, and Security

Date: October 23, 2019